



November 30, 2016

David Seltz, Executive Director
Massachusetts Health Policy Commission
50 Milk Street, 8th Floor
Boston, MA 02109

Re: Revisions to 958 CMR 3.000 et seq., Health Insurance Consumer Protection Regulations

Dear Executive Director Seltz:

On behalf of Blue Cross Blue Shield of Massachusetts (BCBSMA), I write in strong support of the revised Health Insurance Consumer Protection regulations proposed by the Office of Patient Protection (OPP). BCBSMA has long supported the goals of Mental Health Parity, as well as appropriate transparency to ensure compliance.

Each year since 2012, BCBSMA has engaged in a robust review of our policies and procedures as part of our Mental Health Parity compliance certification with the Division of Insurance (DOI) and the Attorney General's Office (AGO). As you know, that certification process includes the submission of detailed data regarding requests, approvals and denials for both medical/surgical and behavioral health and substance use disorder services. We are very pleased to see that the draft regulations contemplate a concurrent submission to satisfy the requirements of Chapter 52 of the Acts of 2016, as well as the annual Mental Health Parity compliance certification.

The avoidance of unnecessarily duplicative filings is a significant positive step towards administrative simplification. I look forward to working with OPP and DOI on the uniform template to be used for these submissions.

Thank you for the opportunity to provide this testimony. Please do not hesitate to contact me at any time at (617) 246-3499.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Caljouw".

Michael T. Caljouw

Cc: Steven Belec, Director, Office of Patient Protection